

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	
	:	Chapter 11
USG CORPORATION,	:	
a Delaware corporation, et al.,	:	Jointly Administered
	:	Case No. 01-2094 (JKF)
Debtors.	:	
	:	
	:	
<hr/>	:	
USG CORPORATION, et al.,	:	
	:	
Movant	:	
	:	
v.	:	
	:	Civil Action No. 04-1559 (JFC)
OFFICIAL COMMITTEE OF	:	Civil Action No. 04-1560 (JFC)
ASBESTOS PERSONAL INJURY	:	
CLAIMANTS, et al.,	:	
	:	
Respondents.	:	

DEBTORS' DISCLOSURE OF WITNESSES/INDIVIDUALS WITH KNOWLEDGE
RE: DEBTORS' AFFIRMATIVE ESTIMATION PRESENTATION

COOLEY GODWARD LLP
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Counsel for Debtors

I. PRELIMINARY STATEMENT

Pursuant to the Court's Order, Debtors submit the following list of potential witnesses and individuals with knowledge that Debtors currently envision as being part of their affirmative case in this matter. Debtors reserve the right to amend, revise, and/or supplement this list after further investigation and discovery. Debtors have not had the opportunity to depose or interview certain classes of witnesses/individuals with knowledge listed below; nevertheless, Debtors have made their best effort to identify individuals they believe at this time will be witnesses and have inserted asterisks next to those names.

II. LIST OF WITNESSES/INDIVIDUALS WITH KNOWLEDGE**A. Witnesses/Individuals with Knowledge re: Sales and Accounting Information for U.S. Gypsum and L&W Supply**

*Edith Hickman

Craig Boroughf

B. Witnesses/Individuals with Knowledge re: Commodity Codes in Accounting Records for U.S. Gypsum's Asbestos-Containing Products

*Jim Young

Suki Look

C. Witnesses/Individuals with Knowledge re: Product Specifications

*Edith Hickman

D. Witnesses/Individuals with Knowledge re: Facts as to Tort System Lawsuits Against Debtors

*John Donahue

Chris McElroy

Mary Martin

Stan Ferguson

Martha Brown

*Al Parnell

*Ed Wilbraham

Jim Pagliaro

Brady Green

See List of Other Outside Law Firms Where Individual Attorneys Have Knowledge, attached as Exhibit A

Bill Hanlon

Larry Fitzpatrick

John Gaul

Other CCR Personnel

E. Witnesses/Individuals with Knowledge re: Labels, Warnings and Products of U.S. Gypsum that Contain Asbestos

*Ed Jakacki

J.D. Cornell

C.M. Howard

F. Witnesses/Individuals with Knowledge re: CCR Database as to Tort System Lawsuits Against Debtors

CCR Custodian of Claim Database Records

G. Witnesses/Individuals with Knowledge re: Asbestos Plaintiff B-Reader Practices

*Dr. Raymond A. Harron

*Dr. Jay T. Segarra

*Dr. James W. Ballard

*Dr. Philip H. Lucas

*Dr. Richard B. Levine

*Dr. George Martindale

Dr. Dominic G. Gaziano

Dr. Ella A. Kazerooni

Dr. Richard Keubler (or Kuebler)

Dr. Larry M. Mitchell

Dr. Barry Levy

Dr. Glyn Hilbun

Dr. Andrew Harron

Dr. Kevin Cooper

Dr. Todd Coulter

Dr. Alvin Schonfeld

Dr. W. Allen Oaks

Dr. Greg Nayden

H. Witnesses/Individuals with Knowledge re: Mass Screening Companies' Generation of Asbestos Claims

*Heath Mason, N&M, Inc.

*A representative of RTS

*Guy Foster, American Medical Testing

Frank Mazza, CPOM

Betsy S. Miller, Innervisions

A representative of Pulmonary Function Lab

A representative of Pulmonary Testing Services

A representative of WDDS

Healthscreen, Inc. of Jackson, MS

Occupational Diagnostics, Ocean Springs, MS

Pulmonary Advisory Services, Inc.

Molly Netherland

Charles Foster

Glen Pitts

Jerry Pitts

William McNeese

Dated: November 7, 2005

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/s/ Paul N. Heath
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EXHIBIT A TO DEBTORS' DISCLOSURE OF WITNESSES/INDIVIDUALS WITH KNOWLEDGE
RE: DEBTORS' AFFIRMATIVE ESTIMATION PRESENTATION

List of Other Outside Law Firms Where Individual Attorneys Have Knowledge:

Anderson, Kill & Olick
Baker & Hostetler
Cetrulo & Capone
Church & Houff (MD)
Danaher, Tedford, Lagnese & Neal (CT)
Dehay & Elliston L.L.P.
Deutsch, Kerrigan & Stiles
Foley & Lardner
Forman, Perry, Watkins, Krutz & Tardy
Germer, Bernsen & Gertz, L.L.P.
Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim
Haight, Brown & Bonesteel
Harvey, Kruse, Westen & Milan
Hawkins & Parnell
Heyl, Royster, Voelker & Allen
Hisaka, Furusho, Ayabe & Goto
Hood Law Firm
Kalinowski & Chaplinsky
Locke, Reynolds, Boyd & Weisell
McKenna & Cuneo
Morgan Lewis
Peabody & Arnold
Picillo Bromberg Caruso
Pierce, Hems, Sloan & Mcleod, LLC
Powers & Frost, L.L.P.
Swensen Perer & Kontos
Valocchi & Sasso, P.A.
Wells, Moore, Simmons and Hubbard, PLLC
Wilbraham, Lawler & Buba